

Comments on Petition RM-10781
Regarding Changes in Morse Code Testing Requirements for Amateur Radio Licenses

I am a radio amateur, W2JLK, and I want to register my opposition to proposals that advocate reducing or eliminating Morse code proficiency requirements for US amateur radio licenses.

At their core, this and similar proposals claim that:

1. Morse code proficiency should be eliminated because it is not necessary for “modern” amateur radio operation and
2. Maintaining such requirements “deprives otherwise excellent operators” from access to high-frequency (HF) spectrum privileges. Some proposals further claim specific reasons why the “otherwise excellent” operators would be unfairly restricted.

Regarding claim 1: Even the most casual observation of amateur radio operations shows that Continuous Wave (CW, i.e., mode A1A) operation is very active and indeed the CW band segments are even crowded with Morse code operators. Major contests use CW and many (including those that specifically are intended to promote state of the art advancement, technical skills and efficient use of the bands – e.g., “home brew “ QRP contests) use CW exclusively (or together with digital modes). CW is clearly a vital part of amateur radio regarding communications under extreme conditions of low power, long distance and poor propagation.

In addition, CW remains an important component of one of amateur radio’s fundamentals – providing emergency communication service. Although SSB and other modes compliment CW, CW is the only mode easily accessible by simple and extremely survivable emergency equipment. Eliminating code proficiency will reduce the pool of people who can provide this service.

Finally, CW provides the most efficient use (along with equipment-complex digital modes) of limited spectrum and thereby provides HF access to the largest potential number of people. To the extent that unqualified CW operators are allowed to use all the CW band segments, the highly efficient use of the bands is diminished. HF spectrum is a shared, limited public resource and FCC policy should (and in the past, always did) aim to allow its use by the largest number of people. Promoting skilled CW operation does just that. Allowing unrestricted, unskilled CW operation (as would result from eliminating any CW proficiency requirement to access these band segments) is clearly contrary to this goal.

In summary, arguments that CW is antique or not important to amateur radio are just wrong or perhaps intended to be intentionally misleading. CW is a vital part of amateur radio and skilled, efficient use of CW spectrum should be promoted and assured by retaining standards that ensure minimal level of competence to use this mode.

Given the value of CW and to amateur radio and its high level of use on the bands, it is important for the FCC to ensure that those who have access to CW operation on HF spectrum are qualified to use it.

Regarding Claim [2]: Opponents of CW proficiency testing have offered no evidence for the claim of the existence of a group of individuals (beyond those already given, by the FCC, adequate exception for certain disabilities) who lack the inherent ability to learn Morse code to the level of 5 wpm. Indeed, there is a large amount of evidence^{1, 2} that essentially anybody who wants to can, with the investment of some reasonable level of effort, learn Morse code. Professional studies of large numbers of people support this, as do thousands of anecdotal examples (e.g., children as young as 6 years old learning 5 wpm code.) It is almost borders on the ridiculous to claim that adults who learned, as children, 26 associations between spoken letter sounds and written letter symbols are unable to learn associations between 26 different letter sounds (i.e., the Morse code equivalents) and the same written symbols. Moreover, these same adults with claimed inability to learn 26 sound/symbol associations are able to learn thousands of other image/word associations needed for daily life. There is just no scientific data to support the existence of a supposed population of specifically Morse-code challenged learners.

The FCC already provides adequate accommodation for those few hams with legitimate disabilities that make it difficult to pass the standard Morse code proficiency tests. There is no need to eliminate the testing requirements for the vast majority of applicants who are completely able to learn the code if they want to expend the minimal effort to do so.

Some no-code proposals argue that code requirements are unfair to those who have no intention operate in the CW band portions. In fact, however, most of these proposals advocate that these people should be given unrestricted access to these very segments. CW operation is somewhat different than voice operation in that a specialized skill is required³ and this skill should be verified before allowing access to band segments reserved for this mode.

Some of the “no-code” proposals claim that US code testing requirements are unfair because the ITU and several countries have eliminated their code proficiency requirements. These arguments are specious because of the huge differences in the amateur radio populations of the US and any other country. Specifically, the US contains the vast, world-wide majority of amateur radio operators. Our US policy shouldn’t be driven by the policies of other much, much smaller countries with very different spectrum usage attributes and requirements.

Summary – CW remains a critical part of amateur radio and is needed to promote the most efficient and widespread use of the spectrum. The physics of communications,

¹ Bryan, W. L., & Harter, N. (1899). Studies of the telegraphic language: The acquisition of a hierarchy of habits. *Psychological Review*, 6 345-375.

² Keller, F. S. (1958). The phantom plateau. *Journal of the Experimental Analysis of Behavior*, 1, 1-13.

³ There are specialized skills needed for voice operation. However, most of them (such as ID requirements, band segment limits, etc.) and others (i.e., simply speaking or verbalizing phonetics) are skills we can generally assume in most applicants.

bandwidth and information theory support this. Opening, on an uncontrolled, unrestricted basis, HF spectrum – and specifically CW portions – to unskilled and untested operators works against the important objectives and responsibilities of the FCC. I urge the FCC to reject all proposals to eliminate Morse code proficiency testing as a requirement for HF access.